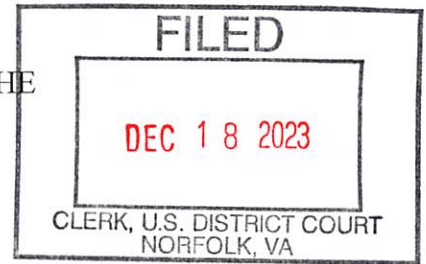


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
*Newport News Division*



UNITED STATES OF AMERICA

v.

ACACIA JACKSON  
a/k/a "Dominant,"

DONNISHA GOODMAN  
a/k/a "Lady Henny,"

Defendants.

Case No. 4:23-mj- 89

**AFFIDAVIT IN SUPPORT OF A  
CRIMINAL COMPLAINT AND ARREST WARRANTS**

I, David Mitchell, Special Agent, Federal Bureau of Investigation (FBI), Newport News, Virginia, being duly sworn, state the following:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the FBI and have been since 2017. That is, I am an officer of the United States, who is empowered by law to conduct investigations regarding violations of United States law, to execute warrants issued under the authority of the United States, and to make arrests of those offenses, as enumerated in Title 18, United States Code, § 3052. Prior to my employment with the FBI, I served as an officer in the United States Marine Corps for approximately six years, and I worked as a Process Engineer for a manufacturing company for approximately 4 years. I am currently a member of the FBI Safe Streets Peninsula Task Force (SSPTF). In the course of my duties, I am responsible for investigating crimes which include, but are not limited to, white collar crime, violent crime, criminal organizations, crimes

against children, and robberies. Since joining the FBI, your Affiant has received specialized training in criminal investigations, including those involving criminal gangs and violent offenses.

2. The facts and information contained in this Affidavit are based upon my training, knowledge, experience, and discussions and observations with other law enforcement officers. All observations not personally made by me were related to me by the individuals who made them or were conveyed to me by my review of records, documents, and other physical evidence obtained during the course of this investigation. This Affidavit contains information necessary to support probable cause and is not intended to include each and every fact and matter observed by me or known to the Government.

3. This Affidavit is submitted in support of a criminal complaint charging **ACACIA JACKSON** (hereinafter JACKSON) and **DONNISHA GOODMAN** (hereinafter GOODMAN, and collectively, the defendants) with kidnapping resulting in death, in violation of 18 U.S.C. §§ 1201(a)(1) and 2.

### **PROBABLE CAUSE**

#### **A. Background**

4. The FBI, Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), and local law enforcement agencies (hereinafter, the investigative team) have been conducting an investigation of criminal activity of a criminal organization that refers to itself in internal communications as affiliated with the “Black P. Stones,” amongst other things.

#### **B. The May 6, 2023, Homicide of T.M.**

5. On or about May 6, 2023, at approximately 6:30 a.m., a resident of York County, Virginia, called 911 after identifying what appeared to be a person lying in the woods off of Old

Williamsburg Road.

6. Members of the York-Poquoson Sheriff's Office (YPSO) responded to the complaint and discovered a deceased black female laying in the wood line off of Old Williamsburg Road near the cross street of Daniels Drive, in York County. She was found without shoes on and was not wearing a bra.

7. York County is within the Eastern District of Virginia.

8. Members of the YPSO canvassed the area around the crime scene for information about the crime. A resident reported hearing several gunshots at approximately 3:47 a.m.

9. Members of the YPSO determined the identity of the victim to be T.M., with a last known address of an apartment located at \*\*\*\* Bethel Street, Richmond, Virginia.

10. Richmond is in the Eastern District of Virginia.

11. Members of the YPSO collected 14 total 9mm cartridge casings with the headstamp "S&B" from the scene.

12. A subsequent autopsy conducted by the Office of the Chief Medical Examiner for the Commonwealth of Virginia found that T.M. suffered eight gunshot entry wounds.

13. According to the Medical Examiner, T.M.'s cause of death was determined to be multiple gunshot wounds, and the manner of death was found to be homicide.

14. Members of the YPSO initiated an investigation into the homicide. They interviewed friends and family members of T.M.

15. Members of the YPSO also obtained video footage from relevant businesses near the scene of the homicide and near T.M.'s residence, reviewed T.M.'s social media accounts, and searched T.M.'s apartment pursuant to a search warrant.

**C. Surveillance Video Footage from the Vicinity of T.M.'s Residence**

16. Members of the YPSO collected video footage from outside T.M.'s apartment on the evening of May 5, 2023, through the morning of May 6, 2023.

17. Your Affiant has reviewed surveillance footage showing that at approximately 1:08 a.m. on May 6, 2023, a dark-colored sedan with a defect in the right taillight arrived at T.M.'s residence. The footage further revealed that, at approximately 1:14 a.m., four subjects exited the sedan and walked towards the victim's residence on Bethel Street. At approximately 1:38 a.m., multiple subjects departed the area in the dark colored sedan with the taillight defect.

18. Your Affiant has also reviewed surveillance footage showing that at approximately 2:28 a.m., the dark-colored sedan with the taillight defect returned. After parking, five individuals exited the vehicle and approached T.M.'s residence.

19. Your Affiant has reviewed surveillance footage showing that members of the group entered T.M.'s residence. Soon thereafter, at approximately 2:34 a.m., five individuals and T.M. departed the area in the dark-colored sedan with the taillight defect, while at the same time, a separate individual appeared to have fled the area after jumping from a second-story window of T.M.'s residence.

**D. Investigators Identified a Black Hyundai Sonata Used in the Crime**

20. Members of the Richmond Police Department identified a vehicle of interest by comparing license plate readers in the area around T.M.'s residence with the timing of the arrivals and departures of the dark-colored sedan with taillight defect observed on the aforementioned surveillance videos from section C.

21. Members of the Richmond Police department confirmed the vehicle of interest was a black Hyundai Sonata sedan bearing Virginia license plate ending in 9340.

22. Your Affiant has reviewed the shape and features of the black Hyundai Sonata identified by members of the Richmond Police Department and compared it to the dark-colored sedan with the taillight defect reviewed from surveillance footage in the vicinity of T.M.'s residence. The dark-colored sedan appears to be the Hyundai Sonata identified herein.

23. Members of the YPSO conducted a check with the Virginia Department of Motor Vehicles, which revealed that GOODMAN was the registered owner of the Hyundai sedan.

**E. Surveillance Video Footage on the Route to the Scene of the Homicide**

24. Members of the YPSO also collected surveillance video from local businesses near the scene of the homicide in York County. According to reports from YPSO, footage from W & J Auto Repair, located at \*\*\*\*\* Jefferson Avenue, Newport News, Virginia showed that the Hyundai sedan with the taillight defect arrived at an adjacent 7-Eleven gas station at approximately 3:29 a.m. on May 6.

25. Members of the YPSO collected additional footage from inside the 7-Eleven gas station, located at \*\*\*\*\* Jefferson Avenue, Newport News, and identified two individuals believed to be coconspirators 2 and 3 who entered the store and paid for items with cash. Members of the YPSO further reviewed the footage, which showed that the Hyundai sedan with the taillight defect departed at approximately 3:38 a.m., heading east on Route 238, toward Old Williamsburg Road. The 7-Eleven gas station at \*\*\*\*\* Jefferson Avenue is approximately 3.6 miles from the scene of the homicide.

26. Members of the YPSO also collected and reviewed video surveillance from the Yorktown Revolutionary War Museum at \*\*\* Water Street, which showed a dark-colored sedan drive to the building entrance, approaching from the area of Old Williamsburg Road, and make a U-Turn to return to Old Williamsburg Road at approximately 3:44 a.m. The angle of the video surveillance and intervening vegetation prevent your Affiant from analyzing the vehicle's taillights. The Yorktown Revolutionary War Museum is less than a mile from the scene of the homicide.

27. Members of the YPSO collected video surveillance from an Exxon located at \*\*\*\* New Kent Hwy, Quinton, Virginia 23141, which is between Yorktown and Richmond. Members of the YPSO reviewed that footage, which revealed a dark-colored Hyundai sedan with taillight defect arrive at approximately 4:32 a.m. After waiting for a customer at an adjacent pump to leave, a black male wearing a white shirt and what appeared to be a black mask, believed to be coconspirator 1, exited the driver-side passenger door and began pumping gas. When he was finished, he opened the driver's door. A black female with long, straight, blue hair wearing a black and white hat exited the driver's position in the vehicle, and changed places with coconspirator 1. Your Affiant has reviewed pictures of GOODMAN with a similar hairstyle in close proximity to the date of the kidnapping. The vehicle then departed the gas station at approximately 4:42 a.m. The Exxon gas station is approximately 46 miles from the scene of the homicide.

**F. Surveillance Video Footage at the Scene of the Homicide**

28. Members of the YPSO collected video surveillance from residences and a church located in the general vicinity of Old Williamsburg Road. The relative rural setting of the crime

scene, coupled with the specific locations of the residences and church, resulted in no relevant video surveillance.

**G. Investigators Recovered the Hyundai Sonata and Arrested GOODMAN and JACKSON**

29. The Hyundai Sonata sedan owned by GOODMAN was located and stopped by Norfolk Police on May 7, 2023, at approximately 5:29 a.m., in Norfolk, Virginia. Your Affiant has reviewed the police report for this traffic stop, which noted that JACKSON, GOODMAN, and coconspirator 3 were present in the vehicle at the time of the stop.

30. Members of the YPSO then obtained and executed a search warrant for the Hyundai Sonata. According to a YPSO report, among the items found in the vehicle were a 9mm cartridge with the headstamp "S&B," multiple cellular phones, and a black face mask.

31. On May 10, 2023, members of YPSO with the assistance of Portsmouth Police Department (PPD) arrested JACKSON and coconspirators 1, 2, and 3. The group was arrested after they had been seen leaving GOODMAN's apartment on Green St. in Portsmouth. GOODMAN was later taken into custody on June 12, 2023.

32. When coconspirator 1 was arrested on May 10, 2023, PPD officers found a firearm in his waistband.

**H. Information Obtained to Date from Phone Records and Searches of Cellular Phones**

33. Members of the YPSO continued their investigation, searching the contents of cell phones pursuant to search warrants, and obtaining other relevant information, including call histories and location information.

34. The investigative team, having reviewed information obtained from cellular devices associated with the investigation, identified the following information of note about the defendants' gang.

a. In or about the spring of 2023, Coconspirator 1 led a group chat with the other members of the gang, to include JACKSON and GOODMAN. In internal communications, the group refers to their organization as affiliated with the "Black P. Stones," amongst other organizations.

b. T.M.'s moniker was "Barretta."

c. JACKSON's moniker was "Dominant."

d. GOODMAN's moniker was "Lady Henny."

e. Within the organization is a hierarchy and chain of command, passed on by coconspirator 1 to the remaining members of the gang via text message on or about April 6, 2023. T.M. was the "Krown Prinxe." JACKSON and GOODMAN were each a "First Lady."

f. In a similar text from February 12, 2023, coconspirator 1 explained to the group that within the rules of the organization, each member must pledge to kill anyone who opposed them:

*( PLEDGE ) I PLEDGE MY LOVE AND LOYALTY TO ALMIGHTY BLAKK P. STONE NATION WHICH I WILL DEFEND UPLIFT AND IF NECESSARY KILL ANYONE WHO OPPOSE MY SET! ONLY DO I FEAR GOD, AND FROM THIS DAY FORWARD UNTIL THE RED SUN TOUCH THE EARTH I WILL RIDE FOR MY BROTHERS AND SISTERS AND BRING HONOR TO MY STONE NATION. AS A BLACK P STONE MEMBER ITS MY SET BEFORE ANOTHER SET BPS TIL MY DEATH*



g. That same day, coconspirator 1 also set forth the expectation that all members of the organization would act together:

*Stone Motto: When one ride we all ride, nothing or no one comes before a stone. Two on two or twenty or two we gone bang for our's who bangs on a stone is a stone plate.*

h. Additionally, that same day, coconspirator 1 ensured all members of the organization understood failure to follow rules would lead to discipline:

*MEMO Date: 02.12.2023 To: All Vietnam BSG Members From: Krown Prinxe CC: File, Chairman, Prince, Ambassadors RE: Chain of Command/Communication The Chain of Command shall be followed. Anyone who jumps the chain will be dealt with accordingly. We will hold you accountable for your actions... One is not to reach outside his / Her Region or Boroughs to get permission to act on any project without first checking with your Region / Borough Ambassador. The Chain of Command was created to keep order within our organizations. Without order there would be chaos... Anyone who fails to follow the rules or memos set will be stripped/booted from this Tribes... Failure to do so will result in punishment. NO EXCEPTIONS. We promise you will be held accountable...*

35. Your Affiant and the investigative team reviewed additional relevant cellular data, to include text messages, call detail records, and location data of JACKSON, GOODMAN, and suspected coconspirators, as well as the contents of cell phones associated with the group, obtained pursuant to search warrants. The following information obtained from those sources is of note with respect to the charged crime.

a. A photograph of JACKSON and GOODMAN, taken on or about May 2, 2023, depicts GOODMAN with long, straight, blue hair. Your Affiant believes the hair style depicted here is identical to the hairstyle of the black female your Affiant observed on the Exxon gas station surveillance video described in paragraph 29.

b. Around a day before the homicide, a phone number ending in 8392 subscribed to and associated with JACKSON texted with T.M. about JACKSON and others coming to T.M.'s apartment, as follows:

May 5, 2023

8:59 p.m. JACKSON phone ending in 8392:	Wh21xp
9:28 p.m. JACKSON phone ending in 8392:	Yooo
9:28 p.m. JACKSON phone ending in 8392:	We otw to yah shii
9:28 p.m. T.M. phone ending in 3249:	Ok
9:48 p.m. T.M. phone ending in 3249:	Where y'all at
10:23 p.m. JACKSON phone ending in 8392:	Almost thereee
10:43 p.m. JACKSON phone ending in 8392:	Her tire got flat
10:45 p.m. T.M. phone ending in 3249:	What's t? Kause this shit out of the blue. Don't beat round the bush. SAY WHAT IT ID AND WHAT IT AINT.
10:48 p.m. JACKSON phone ending in 8392:	Wym what's out the blue fytb
11:04 p.m. T.M. phone ending in 3249:	Ok

May 6, 2023

1:15 a.m. JACKSON phone ending in 8392:	Yoooooooo
1:16 a.m. T.M. phone ending in 3249:	You niggas was supposed me dub me last night

c. GOODMAN'S phone internet search history reflects searches for tire repair locations around a day before the homicide.

d. A review of the toll records for GOODMAN revealed that she communicated with the phone associated with coconspirator 1 at least eight times between 5:00 p.m. and 10:00 p.m. on May 5, 2023.

e. On May 5, 2023, at around 11:00 p.m., the user of the phone ending in 1545 associated with GOODMAN texted a third party, "In the car."

f. A review of the toll records for JACKSON revealed that she communicated with the phone associated with coconspirator 1 at least four times between 5:00 p.m. and

10:00 p.m. on May 5, 2023. JACKSON attempted to call T.M. three times between 1:10 a.m. and 1:15 a.m. on May 6, 2023.

g. Records for the phone number ending in 8392 subscribed to JACKSON show that her device was in the vicinity of T.M.'s residence around the time that the group first came on the morning of May 6, 2023.

h. Around that same time, between approximately 1:05 a.m. and 1:40 a.m. on May 6, 2023, the phone associated with GOODMAN was in the vicinity of T.M.'s residence in Richmond (consistent with the time period when T.M. was first attacked).

i. At 3:11 a.m. on May 6, 2023, the user of the phone ending in 1545 associated with GOODMAN was communicating with a third party. This communication occurred more than 30 minutes after the Hyundai sedan was observed by your Affiant leaving T.M.'s residence.

j. The phone records show the phone number ending in 1545 associated with GOODMAN traveling eastbound on I-64, to the area of the homicide on Old Williamsburg Road.

k. On May 6, 2023, between approximately 3:28 a.m. and 3:50 a.m., the phone associated with GOODMAN was in the vicinity of the scene of T.M.'s homicide.

l. Phone records further reflect that at around 3:42 a.m. on May 6, 2023, the phone subscribed to JACKSON was in the vicinity of Browns Lane and Old Williamsburg Road (approximately 1.7 miles from the scene of homicide).

m. The phone records further show the device with an assigned cellular telephone number subscribed to JACKSON leaving the Yorktown area around 3:52 a.m., headed in the direction of Richmond.

n. Later on the morning of the homicide, May 6, 2023, a phone number subscribed to a third party but associated with coconspirator 2 texted JACKSON and asked, “Yo sis kan u see if my klip in the ride.” Based on my training and experience, I believe that in the aforementioned text message, coconspirator 2 was asking JACKSON to check on whether coconspirator 2’s firearm magazine was in the vehicle.

o. JACKSON, GOODMAN, and their coconspirators used a group chat to coordinate gang activities such as meetings and dues. However, by the middle of the morning on May 6, 2023, JACKSON texted GOODMAN and coconspirators 1, 2, and 3 in a group chat and instructed, “DO NOT TEXT IN THIS GX BY ANY MEAN DELETE THIS GX UNTIL FURTHER NOTICE.” Based on my training and experience, I believe that “GX” in the aforementioned text message means “group chat.”

p. Your Affiant has reviewed JACKSON’S cell phone Internet history from the afternoon after the homicide, which reflected Google searches for crime news, including searches for “Shooting in Yorktown VA today,” “Shooting in Yorktown VA yesterday,” “breaking news Yorktown, va,” “Richmond news,” and “body found in york county, va,” as well as access of a news article, “Investigation underway after missing woman’s body found in York County Woods.”

q. On May 6, 2023, GOODMAN had a note reminder on her phone: “turn your phone off.”

r. On the evening of May 6, 2023, JACKSON texted an individual and said that she “got into some shii” and “might be in New York tonight.”

s. GOODMAN changed her cell phone number on May 6, 2023.

36. Your Affiant believes that the cellular telephones used by the defendants and their coconspirators were instrumentalities of interstate and foreign commerce, and that such use resulted in signs and signals being transmitted in interstate commerce between computers and terminals in the Eastern District of Virginia and computers and terminals outside the Commonwealth of Virginia. Your Affiant further believes that this use of cellular telephones by the defendants and their coconspirators furthered the commission of the kidnapping of T.M. resulting in her death.

**I. Information Obtained through Cash App**

37. Your Affiant reviewed Cash App records associated with JACKSON, GOODMAN, and coconspirators 1, 2, and 3. Cash App is a subsidiary of Block, Inc. headquartered in Oakland, California, and it provides users with a means to wire money to other Cash App users from a variety of digital devices.

38. Your Affiant confirmed the following information associated with JACKSON’s Cash App account C\_8cenpama9:

- a. The account verified JACKSON’s name, date of birth, and last four digits of her social security number.
- b. The account was active on or about May 6, 2023.
- c. The account display name was: Mosthated Stonette.

d. The account completed two “P2P” payment of \$20.00 each, one at 4:33:58 a.m. and one at 4:35:06 a.m. on May 6, 2023. The first P2P payment was to JACKSON, from “TOKYO.” The second payment was from JACKSON, to “CHRISTIAN GREENE.”

39. Your Affiant confirmed the following information associated with GOODMAN’s Cash App account C\_09ezkgy8y:

a. The account verified GOODMAN’s name, date of birth, and last four digits of her social security number.

b. The account was active on or about May 6, 2023.

c. The account display names were: Donnisha Goodman, Hennessi, and Tokyo.

d. The account completed one “P2P” payment of \$20.00 at 4:33:58 a.m. on May 6, 2023. The P2P payment was from GOODMAN, to “Mosthated Stonette.”

40. Your Affiant confirmed the following information associated with Cash App account C\_ftcxxpmn1:

a. The account did not appear to have been verified. A phone number associated with the account ending in 2618 was the phone number utilized by coconspirator 3 on or about May 6, 2023.

b. The account was active on or about May 6, 2023.

c. The account display name was: Christian Greene.

d. The account completed one “P2P” payment of \$20.00 at 4:33:58 a.m. on May 6, 2023. The P2P payment was to Christian Greene, from “Mosthated Stonette.”

e. The account has other P2P transactions from “Tokyo” and “Donnisha.”

f. There is a Card Purchase for \$20.99 at 4:38:52 a.m. on May 6, 2023. The statement description is “NEW KENT EXXON.”

41. Your Affiant believes that the defendants and their coconspirators’ use of banking services like Cash App were facilities of interstate commerce that furthered the kidnapping of T.M. resulting in her death. The payment transfers between the defendants and their coconspirators resulted in signs and signals being transmitted in interstate commerce between computers and terminals in the Eastern District of Virginia and computers and terminals outside the Commonwealth of Virginia.

**J. Cooperating Witnesses**

42. Members of the investigative team, including your Affiant, have interviewed T.M.’s friends and family members, including Cooperating Witness 1 (hereinafter CW-1) and Cooperating Witness 2 (hereinafter CW-2). The following paragraphs include some of the information obtained during those interviews.

43. During the early morning hours of May 6, 2023, T.M. told CW-1 that she had just been attacked by three female members of the gang while a male member watched.

44. CW-1 knew T.M. to be in a gang, understood she carried the title, “First Lady,” and believed she was required to attend meetings in Norfolk, Virginia.

45. On May 5, 2023, T.M. spent the day with her friend, CW-2. CW-2 overheard a phone conversation in which T.M. said that several members of her gang were coming to “jump her out” earlier in the week, but they got a flat tire and were unable to make it to Richmond.

46. On May 5, 2023, T.M. further told CW-2 that she expected members of the organization to try again, and this worried her. She added that if they are coming to get her, then she is going to be beaten out in a “body bag.”

47. On the morning of May 6, 2023, at approximately 1:58 a.m., after the first attack, T.M. sent CW-2 a text containing photographs of T.M.’s injuries that T.M. said that she sustained in a beating.

**K. Recorded Jail Calls of JACKSON and GOODMAN**

48. Members of the investigative team have reviewed monitored and recorded calls placed by JACKSON, GOODMAN, and coconspirators 1, 2, and 3 while in custody. The following information is of note.

49. On May 10, 2023, coconspirator 1 expressed concern that GOODMAN had not been arrested at the same time as the others and that she “ain’t right.”

50. On May 15, 2023, JACKSON spoke with a family member. JACKSON denied that she took part in the homicide but said, “I was there, I was affiliated with them” and that she had “got a ride” with those people the night of the homicide.

51. On May 16, 2023, JACKSON spoke with a family member. JACKSON told a family member that JACKSON “spit on the dead lady,” but that she had “spit on her when she was alive,” and she did not “know what happened after that.” JACKSON also told the family member that she hopes her co-defendants “shut the fuck up.”

52. On June 16, 2023, GOODMAN spoke with a member of her family. GOODMAN discussed how they could talk in coded language, and GOODMAN suggested assigning numbers to letters, like how they talk in the “gang.”



53. On June 19, 2023. GOODMAN was speaking with an unknown female on the phone. The unknown female told GOODMAN that she might be looking at life in prison, and that she has to think about her children. GOODMAN stated that she is not a “snitch” but agreed that she has to start thinking about her children. GOODMAN stated that if she confesses, she and her family will have a “target” on their backs.

### **CONCLUSION**

Your Affiant believes based on the information herein that the defendants unlawfully and willfully seized, confined, inveigled, decoyed, kidnapped, abducted, and carried away T.M. from Richmond on May 6, 2023, that they held T.M. against her will thereafter for purposes that benefited the defendants, and that her death resulted therefrom. That T.M. entered the vehicle barely more than an hour after her initial confrontation with other members of the gang, knowing full well the codes enforced by her group, tells your Affiant she was either forced, coerced, or inveigled into the vehicle. GOODMAN, JACKSON, and their coconspirators had already beat T.M. at her residence, a populated location rife with cameras and potential witnesses. GOODMAN, JACKSON, and their coconspirators endeavored to force T.M. to a rural, dark, unfamiliar location because it benefited their plan to harm and kill T.M. in anonymity.

Furthermore, your Affiant believes based on the information herein that the defendants used means, facilities, and instrumentalities of interstate and foreign commerce—namely, cell phones, mobile Internet and payment applications, and the Hyundai vehicle registered to GOODMAN, among other things—in committing and in furtherance of the commission of this offense.

Based on the information provided in this Affidavit, there is probable cause to believe that the defendants committed kidnapping resulting in death, in violation of 18 U.S.C. §§ 1201(a)(1) and 2.



David Mitchell  
Special Agent  
Federal Bureau of Investigation

Read and Approved:



Lisa R. McKeel  
Managing Assistant United States Attorney  
D. Mack Coleman  
Assistant United States Attorney  
Alyson C. Yates  
Alyssa Levey-Weinstein  
Special Assistant United States Attorneys

Sworn and subscribed to me  
On this 18th day of December, 2023



Lawrence R. Leonard  
United States Magistrate Judge  
Norfolk, Virginia